EXHIBIT A

UNN-L-003980-17 11/08/2017 11:10:45 AM Pg 1 of 4 Trans ID: LCV2017443068

CHELLI & BUSH
By: Michael T. Madaio, Esq.
ID# 070752013
149 New Dorp Lane
Staten Island, New York 10306
(718) 987-8444
(718) 667-8187 (f)

DELWYN LEWIS and JILLIAN ALVAREZ,

Attorneys for Plaintiff

Plaintiff(s).

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CELADON TRUCKING SERVICES, INC., ERIC GLEN GEIGER SR., JOHN DOES (1-10) (said names being fictitious and unknown persons), and ABC CORP (1-10) (said names being fictitious and unknown entities)

Defendant(s),

SUPERIOR COURT OF NEW JERSEY LAW DIVISION: UNION COUNTY

DOCKET NO .:

CIVIL ACTION

COMPLAINT

Plaintiffs, Delwyn Lewis and Jillian Alvarez, by way of Complaint against the abovenamed Defendants, alleges as follows:

FIRST COUNT

- 1. Plaintiff, Delwyn Lewis, at the time of the commencement of this action, is an individual residing at 311 Gordon Street, Staten Island, Richmond County, New York.
- 2. Plaintiff, Jillian Alvarez, at the time of the commencement of this action, is an individual residing at 311 Gordon Street, Staten Island, Richmond County, New York.
- 3. Upon information and belief, Defendant, Celadon Trucking Services, Inc., is a New Jersey corporation with its headquarters located at 1925 W 450 South, Columbus, Indiana, and at all relevant times the owner of a commercial motor vehicle bearing Indiana license plate number "2388841".

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4. Upon information and belief, Defendant, Eric Glen Geiger Sr., is an individual residing at 2731 Beckon Dr, Edgewood, Maryland 21040, and at all relevant times the operator of the

aforementioned commercial motor vehicle bearing Indiana license plate number "2388841".

5. On or about April 24, 2017, at or around 11:15 a.m., Plaintiffs, Delwyn Lewis and Jillian

Alvarez, were passengers in a motor vehicle that was traveling westbound on I-95 (otherwise

referred to as the "New Jersey Turnpike") in Elizabeth, Union County, New Jersey.

6. At the aforementioned time and place, Defendant, Eric Glen Geiger Sr., operated the

aforementioned motor vehicle bearing Indiana license plate number "2388841", in a negligent

and careless manner, without making proper observations, without the exercise of reasonable

and due care, without keeping his vehicle under adequate control, without maintaining his

appropriate distance and/or lane of travel, without yielding the right of way and/or without due

caution and circumspection, causing his vehicle to strike the plaintiff's vehicle.

7. At all relevant times, Defendant, Celadon Trucking Services, Inc., was the registered

owner of the above-mentioned motor vehicle bearing Indiana license plate number "2388841".

8. As a direct and proximate result of the negligence and carelessness of the Defendants.

Celadon Trucking Services, Inc. and Eric Glen Geiger Sr, in the manner in which they owned,

operated, maintained, controlled, and/or supervised the above-mentioned motor vehicle. a

collision(s) occurred, and the Plaintiffs, Delwyn Lewis and Jillian Alvarez, were caused to

sustain severe, permanent and painful injuries, incurred and will continue to incur medical

expenses in an effort to cure themselves of their injuries, and were otherwise prevented from

attending to their regular pursuits and duties.

WHEREFORE, Plaintiffs, Delwyn Lewis and Jillian Alvarez, demands judgment

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LAW OFFICES

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against all of the Defendants jointly, severally, and alternatively, for compensatory damages, interest, costs of suit, attorneys' fees, and such other relief as the court deems equitable and just.

SECOND COUNT

- 1. Plaintiff repeats and re-alleges all prior allegations as though fully set forth herein.
- 2. At all relevant time, Defendants, John Doe(s) and ABC Corp.(s) (their names being fictitious), were individuals and/or corporate entities whose identities are unknown to the plaintiff, and who contributed to the happening of the aforesaid accident by virtue of negligent and careless ownership and/or operation of the aforementioned motor vehicle, and/or negligent and careless repairs and maintenance to the aforementioned motor vehicle, resulting in it striking the plaintiff's vehicle.
- 3. As a direct and proximate result of the negligence and carelessness of the defendants, John Doe(s) and ABC Corp.(s), together with that of Defendants, Celadon Trucking Services, Inc. and Eric Glen Geiger Sr., the plaintiff was severely and permanently injured as previously set forth herein at length.

WHEREFORE, Plaintiffs, Delwyn Lewis and Jillian Alvarez, demands judgment against all of the Defendants jointly, severally, and alternatively, for compensatory damages, interest, costs of suit, attorneys' fees, and such other relief as the court deems equitable and just.

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JURY DEMAND

Plaintiff demands a trial by jury as to all issues.

DESIGNATION OF TRIAL COUNSEL

The undersigned hereby designates Michael T. Madaio, Esq. as trial counsel for the within matter.

CERTIFICATION PURSUANT TO R. 4:5-1

The undersigned, Michael T. Madaio, Esq., hereby certifies on behalf of the plaintiff as follows:

- 1. I am attorney admitted to practice law in the State of New Jersey, and I am counsel for the above noted plaintiff in the subject action.
- 2. The matter in controversy is not, to my knowledge, the subject of any other pending action in any Court or pending arbitration proceeding, nor is any other action or arbitration proceeding contemplated at this time.
- 3. There are no other parties who should be joined in this action that we are aware of at the present time.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 8, 2017 Staten Island, New York

By: Michael T. Madaio, Esq.

ID# 070752013

CHELLI & BUSH
Attorneys for Plaintiff

149 New Dorp Lane

Staten Island, New York 10306

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Civil Case Information Statement

Case Details: UNION | Civil Part Docket# L-003980-17

Case Caption: LEWIS DELWYN VS CELADON TRUCKING

SER VICES, IN

Case Initiation Date: 11/08/2017
Attorney Name: MICHAEL T MADAIO

Firm Name: CHELLI & BUSH Address: 149 NEW DORP LN STATEN ISLAND NY 10306

Phone:

Name of Party: PLAINTIFF: Lewis, Delwyn

Name of Defendant's Primary Insurance Company

(if known): ILLINOIS NATIONAL INS CO

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-

VERBAL THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS Hurricane Sandy related? NO

Is this a professional malpractice case? NO

Related cases pending: NO If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same

transaction or occurrence)? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE

CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO If yes, please identify the requested accommodation:

Will an interpreter be needed? NO If yes, for what language:

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with *Rule* 1:38-7(b)

11/08/2017 Dated /s/ MICHAEL T MADAIO

ESSEX COUNTY - CIVIL DIVISION SUPERIOR COURT OF NJ 465 MARTIN LITHER KING JR BLVD NEWARK NJ 07102

COURT TELEPHONE NO. (973) 776-9300 COURT HOURS 8:30 AM - 4:30 PM

TRACK ASSIGNMENT NOTICE

DATE: AUGUST 23, 2017 RE: CAVALCANTE VS PEREZ DOCKET: ESX L -006023 17

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRACK 2.

DISCOVERY IS 300 DAYS AND RUNS FROM THE FIRST ANSWER OR 90 DAYS FROM SERVICE ON THE FIRST DEFENDANT, WHICHEVER COMES FIRST. THE PRETRIAL JUDGE ASSIGNED IS: HON JEFFREY B. BEACHAM

100 IF YOU HAVE ANY QUESTIONS, CONTACT TEAM (973) 776-9300.

AT:

IF YOU BELLEVE THAT THE TRACK IS INAPPROPRIATE YOU MUST FILE A CERTIFICATION OF GOOD CAUSE MITHIN 30 DAYS OF THE FILING OF YOUR PLEADING. PLAINTIFF MUST SERVE COPIES OF THIS FORM ON ALL OTHER PARTIES IN ACCORDANCE AITH R.4:5A-2. MILH

ATTENTION:

ATT: BARRY FREDSON FREDSON & STATWORE ILC 915 CLIFTON AVENUE STE 100 CLIFTON NJ 0701

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	VS		Superior Court Of New Jersey
CELADON TRU	CKING SERVICES, INC., ET AL		UNION Venue
		Defendan	t Docket Number: UNN L 3980 17
	served (Name and Address):		Joseph Marie Mile 2000 (7)
ERIC GLEN GE 2731 BECKON I	DRIVE		AFFIDAVIT OF SERVICE
EDGEWOOD M By serving: ER	IC GLEN GEIGER SR.		(For Use by Private Service)
Attorney: MICH	AEL T. MADAIO, ESQ.		Cost of Service pursuant to R. 4:4-3(c)
Papers Served:	SUMMONS AND COMPLAINT, C	CIS, CERTIFICATION	\$
Service Data:	[X] Served Successfully	[] Not Served	
		*	Name of Person Served and relationship/title:
Date/Time:	11/12/2017 AT 11:45 AM		
[] Delivered a c	opy to him/her personally		Janice Geiger, Wife
[x] Left a copy w therein (indicate	ith a competent household membe name & relationship at right)	er over 14 years of age residing	
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registered agent	, etc. (indicate name & official title	at right)	
SEX: F AGE: Unserved: [] Defendant is [] All reasonal [] No such stre [] Defendant is [] Appears vac [] No response	s unknown at the address furni ble inquiries suggest defendant eet in municipality s evading service cant	shed by the attorney moved to an undetermined ne:	N: Black HAIR: Black OTHER: address
Other:	•		
Served Data: Subscribed and Subscribed and Subscribed and Subscribed and Subscribed and Subscribed	day of ANABO (, 2 Notary Commissio Server: Michael Meade MARY PROVINS	n Expiration Address: 2009 Morris Avenue	I, Michael Meade was at the time of service a competent adult, over the age of 18 and not having direct interest in the litigation. I declare under penalty of perjury that the foregoing is true and correct. Muld Signature of Process Server UNION, NJ 07083 Phone: (800) 672-1952
My Com	mission Expires: 09/08	12020	Š